

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

IN RE:)
)
ANTIONETTE BARBER) Case No. 15-35388-KLP
) Chapter 13
Debtor)

MOTION TO INCUR DEBT

COMES NOW, the Debtor, by counsel, and as and for her Motion to Incur Debt, states as follows:

1. The Debtor filed this case under Chapter 13 of the U.S. Bankruptcy Code on October 20, 2015.
2. The Debtor has applied for and Hailey Buick GMC Truck, Inc. has approved a loan to the Debtor in the amount of \$20,000.00 plus interest at 17.99% per annum to be repaid with 72 equal monthly payments of \$400.00 for the purchase of a 2017 Buick Encore or similar vehicle.
3. The Debtor needs to purchase the referenced vehicle because Debtor current vehicle is having major mechanical issues and she needs a replacement vehicle to conduct normal daily business. She will be surrendering her current vehicle that was included in her Chapter 13 plan.
4. The purchase of the vehicle is in the best interest of the Debtor and will facilitate Debtor's ability to perform under the Chapter 13 Plan filed herein.
5. The Debtor's Chapter 13 Plan has been confirmed.

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
(804) 225-9500 (phone)
(804) 225-9598 (fax)
Counsel for Debtor

WHEREFORE, the Debtor requests that the Court enter an Order approving the aforesaid loan on the terms stated herein, waive the 14-day stay pursuant to Fed. R. Bankr. Proc. 8002(a), and for such other relief as the Court may deem appropriate.

ANTIONETTE BARBER

By: /s/ James E. Kane
Counsel

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
(804) 225-9500 (phone)
(804) 225-9598 (fax)
Counsel for Debtor

CERTIFICATE OF SERVICE

I hereby certify that on June 3, 2021, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record who have signed up to receive such notification and by first class mail to the parties on the attached list.

/s/ James E. Kane
James E. Kane

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ANTIONETTE BARBER)	Case No. 15-35388-KLP
)	Chapter 13
Debtor)	

NOTICE OF MOTION

The above Debtor has filed Motion to Incur Debt in the above matter.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then, within twenty-one (21) days from the date of this Notice you or your attorney must:

- File with the court, at the address shown below, a written request for a hearing [or written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for a hearing (or response) to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above, to:

Clerk of Court
United States Bankruptcy Court
701 East Broad Street
Richmond, VA 23219

You must also mail a copy to:

James E. Kane, Esquire
Kane & Papa, P.C.
1313 East Cary Street
Richmond, Virginia 23219

- Attend a hearing scheduled for **June 16, 2021 at 12:00 p.m. at U.S. Bankruptcy Court, 701 East Broad Street, Room 5000, Richmond, VA 23219.** If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Dated: June 3, 2021

ANTIONETTE BARBER

By: /s/ James E. Kane

Counsel

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
(804) 225-9500 (phone)
(804) 225-9598 (fax)
Counsel for Debtor

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/s/ James E. Kane

James E. Kane

United States Bankruptcy Court

Internal Revenue Service
 Centralized Insolvency Operation
 P. O. Box 7346
 Philadelphia, PA 19101-7346

ARM
 PO Box 129
 Thorofare, NJ 08086-0129

701 East Broad Street

Richmond, VA 23219-1888

Aarons, Inc.

P.O. Box 102746
 Atlanta, GA 30368-2746

Aldous & Associates
 PO Box 171374
 Holladay, UT 84117-1374

Alliance One
 Attn: Bankruptcy
 Po Box 2449
 Gig Harbor, WA 98335-4449

American Credit Accept

961 E Main St
 Spartanburg, SC 29302-2185

Approved Cash Advance
 6341 Jahnke Road
 Richmond, VA 23225-4142

CJW Medical Center
 PO Box 740760
 Cincinnati, OH 45274-0760

Capital One
Attn: Bankruptcy

Po Box 30285
 Salt Lake City, UT 84130-0285

Capital One Bank (USA), N.A.
 PO Box 71083
 Charlotte, NC 28272-1083

Cash 2 U Financial Services of VA LLC
 6100 Midlothian Turnpike
 Richmond, VA 23225-5922

Cash 2 U Payday Loans
 6100 Midlothian Tnpk
 Richmond, VA 23225-5922

Check City
 2729 B West Broad Street
 Richmond, VA 23220-1905

City of Richmond
 Office of Finance
 PO Box 26505
 Richmond, VA 23261-6505

City of Richmond
 Parking Enforcement
 PO Box 26505
 Richmond, VA 23261-6505

City of Richmond - City Hall
 Room 109 Delinquent Taxes
 900 East Broad Street
 Richmond VA 23219-1907

City of Richmond - Dept. of Public Utilities
 730 E. Broad Street, 5th Floor
 Richmond, VA 23219-1861

Constance Ford
 1321 Dance Street
 Richmond, VA 23220-6116

Credit Collection Services
 Two Wells Avenue
 Dept. 9136
 Newton Center, MA 02459-3225

Department of the Treasury
 Internal Revenue Service
 PO Box 7346
 Philadelphia, PA 19101-7346

ESM Enterprises
 PO Box 11128
 Pensacola, FL 32524-1128

Fed Loan Serv
 Po Box 60610
 Harrisburg, PA 17106-0610

First Premier Bank
 601 S Minnesota Ave
 Sioux Falls, SD 57104-4868

First Virginia
 PO Box 4115
 Concord, CA 94524-4115

Golds Gym
 c/o Conexion
 PO Box 72609
 Rosedale, MD 21237-8609

Internal Revenue Service
 Centralized Insolvency Operation
 Philadelphia, PA 19101-7346

P.O. Box 10497

PO Box 980462

Greenville, SC 29603-0497

Richmond, VA 23298-0462

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assignee of MHC Receivables, LLC

Resurgent Capital Services

PO Box 10587

Greenville, SC 29603-0587

MCV HOSPITAL

P O BOX 980462

RICHMOND, VA 23298-0462

MCV Physicians

PO Box 91747

Richmond, VA 23291-9747

Midland Credit Management Inc as agent for

Midland Funding LLC

PO Box 2011

Warren MI 48090-2011

National Credit Adjust

Po Box 3023

Hutchinson, KS 67504-3023

Navient Solutions, LLC. on behalf of

Educational Credit Management Corporatio

PO BOX 16408

St. Paul, MN 55116-0408

Oakhurst Manor LP

20 S. Auburn Ave.

Richmond, VA 23221-2910

Parrish & Lebar

5 East Franklin Street

Richmond, VA 23219-2105

Premier Bankcard, Llc

c o Jefferson Capital Systems LLC

Po Box 7999

Saint Cloud Mn 56302-7999

Progressive Advanced Insurance

PO Box 55126

Boston, MA 02205-5126

Protas, Spivok & Collins

4300 East West Highway

Suite 900

Bethesda, MD 20814-4433

Receivable Management

7206 Hull Street Rd Ste

North Chesterfield, VA 23235-5826

Richmond Finance Company

12560 PATTERSON AVENUE

Henrico, VA 23238-6412

Richmond Finance Company

PO Box 29657

Richmond, VA 23242-0657

South Slope Associates

3951-A STILLMAN PKWY

Glen Allen, VA 23060-0000

Taxing Authority Consulting Sv

PO Box 31800

Henrico, VA 23294-1800

(p)ROBERT P MCINTOSH

U S ATTORNEY S OFFICE

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919 E MAIN ST SUITE 1900

RICHMOND VA 23219-4625

Virginia Commonwealth Univer.

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Suite 3300

Richmond, VA 23284-9091

Virginia Commonwealth University

VCU

700 West Grace Street, 3rd Fl. Ste 3300

PO Box 843054

Richmond, VA 23284-3054

Wells Fargo Bank

Box 5058 MAC P6053-021

Portland, OR 97208-5058

Wells Fargo Bank

PO Box 13765

Roanoke, VA 24037-3765

West Creek Financial

PO Box 5518

Glen Allen, VA 23058-5518

Antionette Barber

2712 Grantwood Court

Richmond, VA 23225-1543

James E. Kane

Kane & Papa, PC

1313 East Cary Street

P.O. Box 508

Richmond, VA 23218-0508

Suzanne E. Wade

341 Dial 877-996-8484 Code 2385911

7202 Glen Forest Drive, Ste. 202

Richmond, VA 23226-3770

End of Label Matrix

Mailable recipients	56
Bypassed recipients	0
Total	56